



Littler Mendelson, PC
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102.1321

April 2, 2013

Kimberly J. Gost
267.402.30007 direct
267.402.3000 main
kgost@littler.com

VIA ECF

Hon. Sandra L. Townes, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Ravenell, et al. v. Avis Budget Car Rental, LLC, et al.*
Index No. 08-cv-02113


Dear Judge Townes:

We represent Defendants Avis Budget Car Rental, LLC and Avis Rent A Car System, LLC in the above-referenced matter. We write to correct Plaintiffs' representation in footnote 2 of their March 28, 2013 letter to your Honor.

Specifically, Plaintiffs assert that Defendants first provided them with proof of the dates of employment with respect to the seven (7) opt-ins for whom Defendants will seek partial summary judgment through an exhibit attached to Defendants' March 21, 2013 pre-motion letter to your Honor. Plaintiffs' representation is factually false. Defendants produced the documents attached to and referenced in Defendants' March 21, 2013 letter to Plaintiffs on December 9, 2011. Moreover, in an effort to avoid needless motion practice, Defendants have been in contact with Plaintiffs since July 17, 2012 setting forth the facts establishing that these seven (7) opt-ins do not have any damages, and requesting that they voluntarily dismiss their claims with prejudice. Defendants hope that voluntary dismissals can still be achieved; however, to the extent they are not, Defendants will prepare and file a motion seeking the dismissals once your Honor sets a briefing schedule for such motion.

We appreciate the Court's attention to this matter.

Respectfully submitted,



Kimberly J. Gost

cc: Plaintiffs' Counsel, Via ECF